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14 *Attorneys for Defendants Ripple Labs Inc.,  
XRP II, LLC, and Bradley Garlinghouse*

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION

In re RIPPLE LABS INC. LITIGATION

Case No. 4:18-cv-06753-PJH

21 This Document Relates to:

## " ALL ACTIONS

**DECLARATION OF ANA GUARDADO  
IN SUPPORT OF LEAD PLAINTIFF'S  
ADMINISTRATIVE MOTION TO FILE  
UNDER SEAL MATERIALS RELATING  
TO LEAD PLAINTIFF'S MOTION FOR  
CLASS CERTIFICATION**

1 I, Ana Guardado, declare as follows:

2       1. I am Litigation Director at Ripple Labs Inc. I make this declaration in support of  
 3 Lead Plaintiff's Administrative Motion to File Under Seal Materials Relating to Lead Plaintiff's  
 4 Reply in support of Motion for Class Certification ("Motion to Seal"), Dkt. 218. Based on my  
 5 personal experience, knowledge, and review of the files, records, and communications in this  
 6 case, I have personal knowledge of the facts set forth in this Declaration and, if called to testify,  
 7 could and would testify competently to those facts under oath.

8       2. Lead Plaintiff's Motion to Seal seeks to redact portions of Plaintiff's Reply in  
 9 support of Motion for Class Certification, supporting declaration, and 5 exhibits (the "Protected  
 10 Materials"), described in greater detail below. Defendants Ripple Labs Inc., XRP II, LLC, and  
 11 Bradley Garlinghouse (collectively, "Ripple") designated these documents as  
 12 "CONFIDENTIAL" or "HIGHLY CONFIDENTIAL – ATTORNEY'S EYES ONLY" under the  
 13 Stipulated Protective Order as Modified by the Court ("Protective Order"), Dkt. 143. I now  
 14 submit this declaration in support of the Motion to Seal.

15       3. I have reviewed each portion of the Protected Materials, which contain  
 16 information Ripple considers to be highly sensitive and confidential information, the disclosure  
 17 of which could result in competitive harm to Ripple. I submit that the Protected Materials should  
 18 be sealed for the reasons set forth in the below chart:

| Type of Material Defendants Seek to Seal  | Page/Paragraph/Exhibit Numbers to be Redacted or Sealed in Full   |
|---|---|
| Documents or portions thereof describing or providing detailed information on trade secret business information and highly sensitive internal strategy information, disclosure of which would be very likely to result in unjustified competitive harm. | Reply in support of Motion for Class Certification at 6, 9, and 15;<br>N. Spear Decl. at ¶ 9, 10, and 11;<br>Exhibits 70, 72, 73, and 74. |

26       4. Ripple respectfully requests that the Court grant the Motion to Seal and allow the  
 27 Protected Materials to remain under seal.  
 28

1 I declare under penalty of perjury that the foregoing is true and correct. Executed this 7th  
2 day of April, 2023, in San Francisco, California.

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6 Ana Guardado  
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